

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Mihalko, et al.,

Plaintiffs,

v.

The Walt Disney Company, et al.

Defendants.

Case No. 2:19-cv-00789-PJP

**DEFENDANTS' MOTION TO DISMISS  
FOR LACK OF PERSONAL  
JURISDICTION**

**Document Electronically Filed**

Defendants The Walt Disney Company; Disney Vacation Development, Inc.; Disney Vacation Club Management, LLC (formerly known as Disney Vacation Club Management Corporation and incorrectly pled as “Disney’s Vero Beach Resort” and “Disney Vacation Club Management Corporation”); and Walt Disney Parks & Resorts U.S., Inc., by and through their undersigned counsel, hereby move pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure to dismiss Plaintiffs’ claims for lack of personal jurisdiction. In support of their motion, Defendants rely on the accompanying Brief In Support Of Defendants’ Motion To Dismiss For Lack Of Personal Jurisdiction and the Certifications of Daniel Grossman, John McGowan, Yvonne Chang, and Leigh Ann Nieman, which are incorporated herein by reference.

WHEREFORE, Defendants respectfully request that the Court enter an Order in the form proposed herewith granting Defendants’ motion to dismiss for lack of personal jurisdiction and dismissing Plaintiffs’ claims.

Dated: July 18, 2019

Respectfully Submitted,

/s/Frederick P. Marczyk

Frederick P. Marczyk (admitted *pro hac vice*)

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